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No 0000029 ★
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

SHS-11

November 30, 1990

Mr. Gary E. Parker
Warzyn Engineering Inc.
2100 Corporate Drive
Addison, Illinois 60101

Re: Pagel's Pit Site--ARARs

Dear Mr. Parker:

Enclosed are the replies that I received when I circulated the Alternatives Array Document with a request for the identification of applicable or relevant and appropriate requirements (ARARs) and advisories, criteria or guidance to-be-considered (TBCs) that may apply to this site. These replies are from:

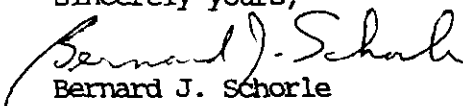
1. Judy Kleiman, RCRA/CERCLA Liaison, October 29, 1990
2. Dale S. Bryson, Director, Water Division, November 2, 1990
3. Stephen M. Johnson, PCB Control Section, November 9, 1990
4. William Beyer, Air and Radiation Branch, November 5, 1990
5. Paul Takacs, Illinois Environmental Protection Agency, November 27, 1990.

You are to provide me with a discussion of these ARARs for the feasibility study report.

I have decided to go ahead with circulating the draft feasibility study report that you sent me. As soon as I receive your discussion of the ARARs, I will circulate these to the same people. I expect that I will be able to provide my comments on the draft feasibility study report in four to five weeks.

I still do not have your item by item response to the comments that were made on the first and second drafts of the remedial investigation report.

Sincerely yours,


Bernard J. Schorle
Remedial Project Manager

Enclosure

cc: P. Takacs, IEPA

Mr. Gary Parker

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November 30, 1990

bcc: T.Hahne, PRC Environmental Management, Inc.
R.Kay, U.S. Geological Survey
S.Kaiser, ORC, USEPA
K.Street, WMD, USEPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: OCT 29 1990

SUBJECT: Pagel's Pit Alternatives Array

FROM: Judy Kleiman, RCRA/CERCLA Liaison



TO: Bernard Schorle, RPM

The Alternatives Array for the Winnebago Reclamation Landfill (WRL) in Winnebago County, Illinois, also known as Pagel's Pit, has been reviewed by RCRA for ARARs. As discussed in my previous memo dated August 1, 1990, this site is complicated by the possibility that some of the contamination here may have originated at another CERCLA site where RCRA waste has been identified.

In the Remedial Investigation Report reviewed previously, there is no evidence that RCRA hazardous waste has been disposed of at WRL, but if the contamination at the WRL site is, at least in part, due to the listed waste disposed of at the Acme site, then remedial actions on the ground water may be subject to RCRA ARARs. Spent solvents and still bottoms from solvent recycling were disposed of at the nearby Acme site. These wastes are RCRA listed wastes F001-F005 and if they are present in the ground water at the Winnebago site, RCRA ARARs would apply to remediation of the ground water. Any residue from the treatment of this ground water would be listed waste and would have to be managed accordingly.

If it is assumed that none of the contamination at the WRL originates from the listed waste disposed of at the Acme site, then RCRA ARARs are only applicable if the residues from the treatment of the ground water are characteristic by the TCLP. Wastes which are characteristic only for a newly identified organic constituent have no treatment standards at this time but can be land disposed only in a subtitle C unit.

It is only the ground water at this site which could be contaminated with RCRA waste from the Acme site. There is no information indicating that any listed waste was disposed of in the Winnebago landfill, and consequently, the leachate from this landfill could not contain listed RCRA waste. According to the data in Table 2 of the Alternatives Array, the leachate from WRL is not hazardous by characteristic for either inorganic or organic constituents and would not be subject to RCRA ARARs.

Since there is no evidence that RCRA hazardous waste has been disposed of at WRL, a subtitle C cap would not be required, although a well designed cap is always recommended.

If you have any questions on this matter, please contact me at 886-1482.

cc: Karl Bremer

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

RECEIVED
NOV 05 1990
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

DATE: 02 NOV 1990
SUBJECT: Water Division Review of the Draft Alternative Array Report
for the Pagel's Pit Site, Rockford, Illinois
FROM: Dale S. Bryson *Dale S. Bryson*
Director, Water Division
TO: David A. Ullrich
Director, Waste Management Division

The Water Division has reviewed the Draft Alternative Array Report for the Pagel's Pit site, as requested by the Office of Superfund. Our comments follow the background summary.

Background

Pagel's Pit is an active solid waste landfill west of the Acme Solvent National Priority List site. Both sites are sources of ground water contamination, especially by volatile organic chemical's (VOC) and semi-volatiles, pesticides and polychlorinated biphenyls (PCB), with Acme Solvent most likely being the source of the VOCs and PCBs. Most of the inorganic content are naturally occurring alkaline earth metals, with toxic metals being arsenic, barium, cadmium and manganese. Cyanide was also found at the site.

The Pagel landfill is bounded on the west by Killbuck Creek which drains to Kishwaukee River. A seasonal or intermittent stream runs north of the site and empties into Killbuck Creek. Ground water flow is generally from east to west intersecting Killbuck Creek. Vertical movement of the ground water has been inferred.

Water Quality Permits

The Remedial Project Manager asked specifically for help with identifying ARARs for the alternative remedial actions. The following action-specific Clean Water Act sections apply for disposal of treated or untreated leachate and ground water to a Publicly Owned Treatment Works (POTW):

40 CFR 122.42 - Notification to permit issuing authority of reevaluation of POTW pretreatment standards.

40 CFR 122.44 - Establishing limitations, standards and other permit conditions.

40 CFR 122.50 - Disposal of pollutants into POTWs

40 CFR 403 - Pretreatment Standards

To be considered for the above situation:

40 CFR 258, 501, 503 - Proposed sludge disposal, criteria and State sludge programs - Please contact John O'Grady, Permits, Sludge Coordinator, at 3-1938 for the latest information on promulgated regulations concerning sludge.

Other ARARs seem to be covered in Table 7 for discharge to a surface water except for:

40 CFR 122.26 - Storm water discharges (applicable to State NPDES Programs; see Section 123.25) (Site-specific)

40 CFR 122.44 - Establishing limitations, standards and other permit conditions.

40 CFR 122.44(d)(1) - Water Quality Based Effluent Limits 1 (Site-specific) (M. Thielke, 3-8841)

Drinking Water Section

The potential applicable, relevant and appropriate requirements (ARAR) for this site include the Safe Drinking Water Act (SDWA) maximum contaminant levels (MCL) and non-zero maximum contaminant level goals (MCLG).

The enclosed list details the current MCLs and MCLGs.
(T. Matheson, 6-6204)

Ground Water Protection Branch

We would like to point out that Illinois is in the process of developing ground water protection standards. The current draft of the standards relies on MCL values and health advisories for remediation standards. The Remedial Project Manager should keep the State standard development process in mind when developing the Remedial Action Plan.
(B. Melville, 6-1504)

The Water Division appreciates the opportunity to review the subject document. If you have any questions regarding these comments, please contact the indicated program staff reviewer.

Attachment

cc: Bernard Schorle

Table 20
Summary of
National Primary Drinking Water Regulations
(as of May 1990)

Contaminant	MCLG ¹	MCL ¹
Microbiological Contaminants		
Coliforms (total)	0	1/100 ml ²
<i>Giardia Lamblia</i>	0	TT ³
HPC	—	TT ³
<i>Legionella</i>	0	TT ³
Virus	0	TT ³
Turbidity	—	1-5 NTU ⁴
Inorganic Contaminants		
Arsenic	—	0.05
Barium	—	1
Cadmium	—	0.010
Chromium	—	0.05
Fluoride	4.0	4.0
Lead	—	0.05
Mercury	—	0.002
Nitrate	—	10
Selenium	—	0.01
Silver	—	0.05

¹ In milligrams per liter (mg/l) unless otherwise noted.
² Revised regulations will be based on presence/absence concept rather than an estimate of coliform density: effective December 1990.
³ TT- Treatment Technique requirements established in lieu of MCLs: effective beginning December 1990.
⁴ Revised regulations will establish treatment technique requirements rather than an MCL for turbidity: effective beginning December 1990.

Cont'd on Next Page



Table 20 Cont'd

Contaminant	MCLG ¹	MCL ¹
Organic Contaminants		
2,4-D	—	0.1
Endrin	—	0.0002
Lindane	—	0.004
Methoxychlor	—	0.1
2,4,5-TP Silvex	—	0.01
Benzene	0	0.005
Carbon tetrachloride	0	0.005
P-Dichlorobenzene	0.075	0.075
1,2-Dichloroethane	0	0.005
1,1-Dichloroethylene	0.007	0.007
1,1,1-Trichloroethane	0.20	0.20
Trichloroethylene	0	0.005
Vinyl chloride	0	0.002
Total trihalomethanes (Chloroform, Bromoform, Bromodichloromethane, Dibromochloromethane)	—	0.10
Radionuclides		
Gross alpha particle activity	—	15 pCi/l
Gross beta particle activity	—	4 mrem/yr
Radium 226 and 228 (total)	—	5 pCi/l



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

NOV 9 1990

DATE: TSCA ARARS Review of Pagel's Pit NPL site, Winnebago Reclamation
Landfill, Winnebago Co. Illinois, CERCLA Alternatives Array Document
SUBJECT: dated Sept. 1990

FROM: Stephen M. Johnson, Geologist
PCB Control Section

TO: Bernard J. Schorle
Waste Management Division, SHS-11

Examination of the Alternatives Array Document (AAD) for Pagel's Pit shows that regulated concentrations of Polychlorinated Biphenyl (PCB) bearing material have not been discovered in leachate, groundwater and local host soils at Pagel's Pit NPL site, Winnebago Co. Ill. Samples from the Pit itself do show anomalous concentrations of PCBs, however. Values are reported between 3-7ppb total PCBs in the leachate only. PCBs are not found anywhere else in spite of tests conducted at over 50 groundwater monitoring stations distributed somewhat randomly along a major E-W monitoring well trend some 7000 feet long that envelopes Pagel's Pit.

This landfill does not appear to be situated in a favorable geologic location. The fact that the facilities are built over an old sand and gravel quarry and that this same material still underlies the landfill suggests that the TOT100 aquifer test for hydrogeologic vulnerability would fail here. The AAD document does not include direct reference to a formal effort to establish the relative effectiveness of the groundwater monitoring program from a hydrogeological perspective but a cursory examination of the geology as presented in the document says that the geologic picture is simple enough to make the monitoring network look adequate.

The monitoring well trend is contained by an unconfined, sandy gravel bearing, partially water saturated stratigraphic unit 0 to over 70 feet thick immediately underlain by vuggy paleozoic dolomites. This trend stretches from a known solvent source through the landfill in question to the nearest permanent surface drainage in the area where the particular hydrologic conditions change.

Although the site is characterized by escape of many volatile hydrocarbons into local groundwaters, the PCB values appear entirely confined by the original landfill barrier system. Records indicate that the landfill is still receiving solid municipal wastes and dewatered sewage treatment sludges and that it received limited quantities of "special" wastes in the past. There is no landfill drilling or information as to the source of the PCBs detected in the leachate but it is reasonable to point to the sludges as being a likely candidate. Municipal sludges bearing concentrations of PCBs above the 50ppm dry weight basis threshold are well documented. Consequently, there is good reason to make sure that the sewage sludges presently being accepted for landfiling are below the 50ppm level. Furthermore it is important to see if there are any old

plant records of PCB analyses on sludges from the sewage treatment works especially starting in 1978 when the Toxic Substance Control Act became effective and when it became illegal to dispose of such material in anything but a TSCA approved chemical waste landfill.

If you have any questions regarding this work please feel free to call me at 886-1330.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: NOV 05 1990

SUBJECT: Review of Alternatives Array Document (AAD) for Pagel's Pit Site
[Winnebago Reclamation Landfill (WRL)], Rockford, IL

FROM: William Beyer, Environmental Engineer WJB
Air and Radiation Branch (5AR-26)

TO: Bernard J. Schorle, Remedial Project Manager
Remedial Response Branch (5HS-11)

THRU: Carlton T. Nash, Acting Chief CTW
Technical Analysis Section

Following are my comments on the subject document in response to your request of October 5, 1990:

Paragraph 3.1.4 of the document notes that "(I)n summary, evaluation of this data indicates that the ambient air quality at WRL does not pose a health hazard based on the standards indicated." The "standards indicated" are the National Ambient Air Quality Standards (NAAQS) of 40 CFR Part 50, which limit the concentration of non-methane hydrocarbons to 0.16 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). The "data" reported to have been obtained from "six ambient air samples and one trip blank", and "of limited value due to exceeded hold time", are reported as showing that "the highest concentration for each compound regardless of location is 0.122 $\mu\text{g}/\text{m}^3$ ", although they note that "(T)otal concentration results for each sample are lower than the maximum value".

My concern is that the limited sampling, particularly with possible bias of the results, may not be adequate to support the conclusion that the ambient air does not pose a health hazard at this 60-acre site. I also note that one of the potential remedial treatments involves air stripping of the groundwater. This process would transfer additional contaminants to the air from the contaminated water, and there would be an even greater question, I feel, as to the representative quality of the ambient air.

In response to your request for applicable or relevant and appropriate requirements (ARARs), I can point only to the pollutant-specific NAAQS. They establish a standard for particulate matter, "measured in air as PM_{10} (particles with an aerodynamic diameter less than or equal to a nominal 10 micrometers)", limiting the 24-hour concentration to 150 $\mu\text{g}/\text{m}^3$ and the annual arithmetic mean to 50 $\mu\text{g}/\text{m}^3$.

As I noted in my comments on my July 26, 1990, review of the draft remedial investigation (RI) report for this site, the four-volume Air/Superfund National Technical Guidance Series, published in 1989 as EPA-450/1-89-(001 thru 004) would provide guidance for remediation efforts in the future, both in its own narrative and in the other publications which it cites.

Thank you for the opportunity to comment on this AAD. If you have any questions, please feel free to call me at 886-6053.

217/524-4827

Refer to: L2018080001 -- Winnebago County
Pagel's Pit -- New Milford
Superfund/Technical Reports

November 27, 1990

Bernard J. Schorle
USEPA - Region V, 5HS-11
230 South Dearborn Street
Chicago, Illinois 60604

Dear Bernie:

In reference to your earlier request, the Illinois Environmental Protection Agency (IEPA) hereby submits ARARs for the Pagel's Pit Superfund site. As we had discussed earlier, these ARARs are similar to those that were provided for the Acme Solvents site. This attachment reflects recent changes in the state's solid waste regulations.

If you have questions or comments, please do not hesitate to call.

Sincerely,

Paul E. Takacs, Project Manager
Federal Sites Management Unit
Remedial Project Management Section
Division of Land Pollution Control

Attachment

cc: Terry Ayers
Division File

GENERAL RESPONSE ACTIONS

POTENTIAL ARARS

On-Site Soils

NO ACTION	1,7,13,14,23,25,28
RCRA LANDFILL ON-SITE	1,7,13,14,22-25,28-30
RCRA LANDFILL OFF-SITE	1,7,13,14,23,24,26-30
SOLID LANDFILL ON-SITE	1,7,13,14,22,25,28,30
TREATMENT IN-SITU	1-4,7,8,13,19,23-25,29,30
TREATMENT ON-SITE	1-4,7,8,13-23,25,30
TREATMENT OFF-SITE	1-4,7,8,13-23,26,27,30
TEMPORARY STORAGE ON-SITE	1,7,13,14,23,25,28,30
INCINERATION	1,5-7,9-14,22-30

Groundwater

NO ACTION	14
TREATMENT ON-SITE (EFFLUENT TO POTW)	14,16,18-22,30
TREATMENT OFF-SITE AT POTW	14,16,18,19,21,30
TREATMENT OFF-SITE AT RCRA FACILITY	14,23,26,27,30
TREATMENT ON-SITE (EFFLUENT TO WATERS OF THE STATE)	14,15,17,20,22,30

Surface Water

DIVERSION/COLLECTION	14,18
TREATMENT ON-SITE (EFFLUENT TO POTW)	14,16,18-22,30
TREATMENT OFF-SITE AT POTW	14,16,18,19,21,30
TREATMENT OFF-SITE AT RCRA FACILITY	14,23,26,27,30
TREATMENT ON-SITE (EFFLUENT TO WATERS OF THE STATE)	14,15,27,20,22,30

Regulations

1. Pollution Control Board Rules and Regulations (PCBRRs); Title 35: Environmental Protection (EP); Subtitle B: Air Pollution (AP); Chapter 1: Pollution Control Board (PCB); 35 Ill. Adm. Code (IAC) Part 201: Permits and General Provisions; Subpart C: Prohibitions; Section 201.141: Prohibition of Air Pollution.
2. PCBRRs; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 201: Permits and General Provisions; Subpart D: Permit Applications and Review Process; Section 201.152: Construction Permit Application.
3. PCBRRs; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 201: Permits and General Provisions; Subpart D: Permit Applications and Review Process; Section 201.157: Operating Permit Application.
4. PCBRRs; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 203: Major Stationary Sources Construction and Modification.
5. PCBRRs; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 212: Visual and Particulate Matter Emissions; Subpart B: Visible Emissions.
6. PCBRRs; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 212: Visual and Particulate Matter Emissions; Subpart D: Particulate Matter Emissions from Incinerators.
7. PCBRRs; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 212: Visual and Particulate Matter Emissions; Subpart K: Fugitive Particulate Matter.
8. PCBRRs; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 212: Visual and Particulate Matter Emissions; Subpart L: Particulate Matter Emissions from Process Emission Sources; Section 212.321: New Process Sources.
9. PCBRRs; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 214: Sulfur Limitations; Subpart B: New Fuel Combustion Emission Sources.
10. PCBRRs; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 215: Organic Material Emission Standards and Limitations; Subpart A: General Provisions.
11. PCBRRs; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 216: Carbon Monoxide Emissions; Subpart C: Incinerators.

12. PCBRRs; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 217: Nitrogen Oxide Emissions; Subpart B: New Fuel Combustion Emission Sources.
13. PCBRRs; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 243: Air Quality Standards; Subpart B: Standards and Measurement Methods; Section 243.126: Lead.
14. PCBRRs; Title 35: EP; Subtitle C: Water Pollution (WP); Chapter 1: PCB; 35 IAC Part 302: Water Quality Standards; Subpart B: General Use Water Quality Standards, and Subpart C: Public and Food Processing Water Supply Standards.
15. PCBRRs; Title 35: EP; Subtitle C: WP; Chapter 1: PCB; 35 IAC Part 304: Effluent Standards; Subpart A: General Effluent Standards.
16. PCBRRs; Title 35: EP; Subtitle C: WP; Chapter 1: PCB; 35 IAC Part 307: Sewer Discharge Criteria; Subpart B: General and Specific Pretreatment Requirements.
17. PCBRRs; Title 35: EP; Subtitle C: WP; Chapter 1: PCB; 35 IAC Part 309: Permits; Subpart A: NPDES Permits.
18. PCBRRs; Title 35: EP; Subtitle C: WP; Chapter 1: PCB; 35 IAC Part 309: Permits; Subpart B: Other Permits.
19. PCBRRs; Title 35: EP; Subtitle C: WP; Chapter 1: PCB; 35 IAC Part 310: Pretreatment Programs; Subpart B: Pretreatment Standards, and Subpart D: Pretreatment Permits.
20. PCBRRs; Title 35: EP; Subtitle C: WP; Chapter 1: PCB; 35 IAC Part 312: Treatment Plant Operator Plant Certification.
21. PCBRRs; Title 35: EP; Subtitle C: WP; Chapter 1: PCB; 35 IAC Part 370: Recommended Standards for Sewer Works.
22. Ill. Revised Statutes; Chapter 19; Paragraph 65(f): Floodplains Construction Permits.
23. PCBRRs; Title 35: EP; Subtitle G: Waste Disposal (WD); Chapter I: PCB and Chapter II: Environmental Protection Act (EPA); 35 IAC Part 700: Outline of WD Regulations; Part 702: RCRA and UIC Permits; Part 703: RCRA Permits; Part 705: Permit Issuance Procedures; Part 720: Hazardous Waste Management System; Part 721: Identification and listing of Hazardous Waste; Part 722: Hazardous Waste Generator Standards; Subparts A-E; Part 723: Hazardous Waste Transporter Standards; Part 724: Standards for Hazardous Waste TSD Facility Owners and Operators; Subparts A-H, L,N; Part 725: Interim Status Standards for Hazardous Waste TSD Facility Owners and Operators; Part 726: Standards.

24. PCBRRs; Title 35: EP; Subtitle G: WD; Chapter I: PCB and Chapter II: EPA; 35 IAC Part 729: Landfills: Prohibited Hazardous Wastes.
25. PCBRRs; Title 35: EP; Subtitle G: WD; Chapter I: PCB and Chapter II: EPA; 35 IAC Part 807: Solid Waste; Subparts B, C, E, F.
26. PCBRRs; Title 35: EP; Subtitle G: WD; Chapter I: PCB and Chapter II: EPA; 35 IAC Part 807: Solid Waste; Subpart B.
27. PCBRRs; Title 35: EP; Subtitle G: WD; Chapter I: PCB and Chapter II: EPA; 35 IAC Part 809: Special Waste Hauling; Subparts B-G.
28. PCBRRs; Title 35: EP; Subtitle G: WD; Chapter I: PCB and Chapter II: EPA; 35 IAC Part 810-815.
29. III. Revised Statutes, Chapter 111 1/2, Paragraph 1039(h).
30. PCBRRs; Title 35: EP; Subtitle H: Noise; Chapter I: PCB; 35 IAC Part 901: Sound Emission Standards and Limitations.

PET:dk/3989n, 78-81